Outgoing
C0410002
OK

Suzanne Steab - June 2010 Inspection Report

From: Karl Houskeeper
To: lroberts@archcoal.com; mdavis@archcoal.com
Date: 7/8/2010 9:12 AM
Subject: June 2010 Inspection Report
CC: ANGELANANCE@utah.gov; DARONHADDOCK@utah.gov; SUZANNESTEAB@utah.gov
Attachments: SUFCO June 2010.pdf

Mike/LeLand,

Attached is the June 2010 inspection report for SUFCO.

Thanks,
Karl

The State of Utah

Department of Natural Resources

Division of Oil, Gas & Mining

ROBERT L. MORGAN
Executive Director

LOWELL P. BRAXTON
Division Director

OLENE S. WALKER
Governor

GAYLE F. McKEACHNIE
Lieutenant Governor

Inspection Report

Representatives Present During the Inspection:	
Company	Mike Davis
OGM	Priscilla Burton Environmental Scientist III
MSHA	Karl Houskeeper Environmental Scientist III

Permit Number:	C0410002
Inspection Type:	COMPLETE
Inspection Date:	Tuesday, June 08, 2010
Start Date/Time:	6/8/2010 7:30:00 AM
End Date/Time:	6/8/2010 3:00:00 PM
Last Inspection:	Wednesday, May 12, 2010

Inspector: Karl Houskeeper, Environmental Scientist III

Weather: Clear, Temp. 75 Deg.. F.

InspectionID Report Number: 2384

Accepted by: jhelfric
6/21/2010

Permitee: **CANYON FUEL COMPANY LLC**
Operator: **CANYON FUEL COMPANY LLC**
Site: **SUFCO MINE**
Address: **397 S 800 W, SALINA UT 84654**
County: **SEVIER**
Permit Type: **PERMANENT COAL PROGRAM**
Permit Status: **ACTIVE**

Current Acreages

25,292.43	Total Permitted
48.43	Total Disturbed
	Phase I
	Phase II
	Phase III

Mineral Ownership

- [x] Federal
- [x] State
- [ ] County
- [ ] Fee
- [ ] Other

Types of Operations

- [x] Underground
- [ ] Surface
- [ ] Loadout
- [ ] Processing
- [ ] Reprocessing

Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

LeLand Roberts, SUFCO, was present during the inspection. Analysis of topsoil and subsoil at the construction location was reviewed. Composite soil sample of the aluvium removed from between 2 - 8 ft. will be analyzed for potential as substitute topsoil. Analysis of pond embankment material was reviewed. Photos in the 6/8/2010 Images folder.

Inspector's Signature: Karl R. Houskeeper **Date** Tuesday, June 08, 2010

Karl Houskeeper, Environmental Scientist III
Inspector ID Number: 49

Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining.

1594 West North Temple, Suite 1210, PO Box 145801, Salt Lake City, UT 84114-5801
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REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS

1. *Substantiate the elements on this inspection by checking the appropriate performance standard.*
   a. *For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.*
   b. *For PARTIAL inspections check only the elements evaluated.*
2. *Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.*
3. *Reference any narratives written in conjunction with this inspection at the appropriate performace standard listed below.*
4. *Provide a brief status report for all pending enforcement actions, permit conditions, Divison Orders, and amendments.*

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	☑	☐	☑	☐
2. Signs and Markers	☑	☐	☑	☐
3. Topsoil	☑	☐	☑	☐
4.a Hydrologic Balance: Diversions	☑	☐	☐	☐
4.b Hydrologic Balance: Sediment Ponds and Impoundments	☑	☐	☑	☐
4.c Hydrologic Balance: Other Sediment Control Measures	☑	☐	☐	☐
4.d Hydrologic Balance: Water Monitoring	☑	☐	☐	☐
4.e Hydrologic Balance: Effluent Limitations	☑	☐	☑	☐
5. Explosives	☑	☐	☐	☐
6. Disposal of Excess Spoil, Fills, Benches	☑	☐	☐	☐
7. Coal Mine Waste, Refuse Piles, Impoundments	☑	☐	☑	☐
8. Noncoal Waste	☑	☐	☑	☐
9. Protection of Fish, Wildlife and Related Environmental Issues	☑	☐	☐	☐
10. Slides and Other Damage	☑	☐	☐	☐
11. Contemporaneous Reclamation	☑	☐	☐	☐
12. Backfilling And Grading	☑	☐	☐	☐
13. Revegetation	☑	☐	☐	☐
14. Subsidence Control	☑	☐	☐	☐
15. Cessation of Operations	☑	☐	☐	☐
16.a Roads: Construction, Maintenance, Surfacing	☑	☐	☐	☐
16.b Roads: Drainage Controls	☑	☐	☐	☐
17. Other Transportation Facilities	☑	☐	☐	☐
18. Support Facilities, Utility Installations	☑	☐	☐	☐
19. AVS Check	☑	☐	☐	☐
20. Air Quality Permit	☑	☐	☐	☐
21. Bonding and Insurance	☑	☐	☑	☐
22. Other	☑	☐	☑	☐

1. Permits, Change, Transfer, Renewal, Sale

The current DOGM permit C/041/0002 was issued effective 05/21/2007 and expires 05/21/2012. Final approval for the construction of the sedimentation overflow pond is dated 10/1/2010. The overflow pond is being constructed on USFS land under a special use permit (p. 1-10) and has added 2.3 acres to the mine site disturbed area (pg 1-11, MRP).

-Certificate of Insurance policy number GL093-61-11, issued 07/31/2009 and terminates 07/31/2010.
-UPDES permit # UT0022918 effective 04/01/2006 and expires @ midnight 04/30/2011.
-Air Quality permit DAQE-AN0665008-06, issued May 26, 2006.
-SPCC Plan dated July 2004. The Plan is P.E. certified, stamped, signed and dated 09/10/2007 by a Utah P.E.

2. Signs and Markers

The ID signs located at the points of public access contained the necessary information.

3. Topsoil

The disturbed area includes several hundred feet of culvert burial where no topsoil salvage is noted. Soil was salvaged from the pond construction area (approximately 100 ft. x 65 ft. x 8 ft. deep). Soil salvage operations are described for new surface operations in Sec. 2.3.1.1 of the MRP. In the fall of 2009, prior to disturbance, the Permittee conducted a site specific soil survey as required by MRP Sec. 2.2.2 p. 2-3. Soil sample analytical information dated 10/2/2009 provided to the Division during this site visit. (The remainder of the survey was not reviewed and will be submitted with the as-built information as required by (Sec. 2.2.2 p. 2-3).) Sample S-4-09 represents the location of the overflow pond and indicates suitable topsoil to a depth of 24 inches where total organic carbon was reported to be 24%. The surface two feet of soil was salvaged from the overflow pond construction area and is stored in a temporary stockpile adjacent to the construction. Mr. Roberts estimated that 900 cu yds were salvaged. The topsoil stockpile volume will be confirmed with as-builts. The remainder of the subsoil removed from the overflow pond location was taken to the waste rock site (about 1,000 cu yds). This material was separated analyzed on 6/1/2010 and found to have pH 8.2, SAR 3.04, ABP = 162t/1000t. P. Burton proposed that the material has value as a topsoil substitute, despite the potential % carbon content (which was not analyzed on 6/1/2010). We, therefore, took a composite sample of the subsoil for additional analysis. The Division took a split of this composite for analysis.

The pond embankment is being constructed of soil imported from the Johnson Ranch. This soil was sampled on 6/1/2010, according to the guidelines for suitability. This soil is noticeably different in color (higher value and chroma) and texture (more clay) than the alluviim removed from the construction area. A copy of the soil analysis dated 6/1/2010, was provided during the inspection. Other than the 30% clay, the imported soil has no unsuitable characteristics. L. Roberts estimates approximately 2,000 cu yds of this fill will be imported to construct the dam. This fill is being mixed at a ratio of 2 imported:1insitu soil to form the compacted embankment. Upon reclamation, the outslope of the pond will be used to reclaim the overflow pond, as described in Sec. 2.2.4 and Sec 5.4.2.2, p. 5-68A.

Little native rock was recovered during the salvage operation and there is no stockpile of rock at the construction site.

4.b Hydrologic Balance: Sediment Ponds and Impoundments

First quarter and second 2010 sediment pond inspection for the mine pond was done on 3/5/2010 and 5/7/2010.. First quarter and second 2010 sediment pond inspection for the waste rock pond was done on 3/26/2010 and 5/21/2010.

Construction on the new sediment pond is taking place. Material (soil) from the foundation has been removed and placed at the refuse pile. The material was highly saturated with moisture and has coal laden particles. Material to construct the foundation and embankment is being hauled in from offsite. Priscilla Burton with the Division was present during the inspection and took a soil sample from the material that was removed from the foundation.

The embankment is being constructed in 6 inch lifts and compacted with a vibrating sheeps foot roller. Compaction is being measured frequently with a neumatic probe. Compaction of 92-97% is being achieved. Water from springs above the dam is being diverted into a a culvert. Several springs have not yet been captured and their combined flow (division estimates 3 gpm) is accumulating behind the dam. This pooled water is being pumped out to flow downstream through silt fences. Nelco Construction is doing the work.

4.e Hydrologic Balance: Effluent Limitations

The discharge monitoring reports for April 2010 were reviewed. Outfall 001 did not discharge. Outfalls 002 and 003 discharged but did not exceed any parameters.

7. Coal Mine Waste, Refuse Piles, Impoundments

The first qurter refuse pile inspection was done on 3/26/2010 and the second quarter refuse pile inspection was done on 5/21/2010.

8. Noncoal Waste

Items of noncoal waste items identified on the previous inspection have been properly managed.

21. Bonding and Insurance

The bond amount is $4,439,000.00

22. Other